

NIKKI BOLLINGER GRAE, Individually
and on Behalf of All Others Similarly
Situated,

Plaintiff,

v.

CORRECTIONS CORPORATION OF
AMERICA, DAMON T. HININGER,
DAVID M. GARFINKLE, and TODD J.
MULLENGER,

Defendants.

WHEREAS, Plaintiff Nikki Bollinger Grae (“Plaintiff”) filed her putative Class Action Complaint (“Complaint”) on August 23, 2016, alleging violations of the Securities Act of 1934 and Rule 10b-5 promulgated thereunder;

WHEREAS, Corrections Corporation of America (“CCA”), Damon T. Hininger (“Hininger”), and David M. Garfinkle (“Garfinkle”) were served with the Complaint on August 29, 2016;

WHEREAS, pursuant to Federal Rule of Civil Procedure (“Rule”) 12(a)(1), CCA, Hininger, and Garfinkle must file any Answer or Motion to Dismiss within 21 days after service of the Complaint;

Case 3:16-cv-02267 Document 18 Filed 09/19/16 Page 1 of 4 PageID #: 72

in a private securities class action is filed, the plaintiff shall publish a notice advising members of the purported plaintiff class, (ii) not later than 60 days after the date on which the notice is published any member of the purported class may move the court to serve as lead plaintiff, and (iii) not later than 90 days after the date on which notice is published the Court shall appoint the “most adequate plaintiff” as lead plaintiff for the class (“Lead Plaintiff”);

WHEREAS, it is customary in securities class action cases under the PSLRA for the appointed Lead Plaintiff to file a consolidated amended complaint (“CAC”);

WHEREAS, Plaintiff and CCA, Hininger, Garfinkle, and Todd J. Mullenger (collectively “Defendants,” and together with Plaintiff, the “Parties”) have met and conferred, and for the convenience of all Parties and the Court, hereby enter into the following stipulation regarding the briefing schedule in this matter;

NOW, THEREFORE, the Parties, through their undersigned attorneys and subject to the Court’s approval, stipulate and agree to the following:

1. Defendants need not respond to Plaintiff’s current Complaint, filed August 23, 2016;
2. Within 60 days of the Court’s appointment of a Lead Plaintiff in this action, Lead Plaintiff will file a CAC;
3. Defendants’ response to the CAC will be due 60 days after Lead Plaintiff files its CAC;
4. If Defendants move to dismiss the CAC, Lead Plaintiff’s opposition(s) to Defendants’ motion(s) to dismiss will be due 45 days after Defendants file their motion(s) to dismiss; and

5. If Defendants move to dismiss, Defendants' reply (or replies) to Lead Plaintiff's opposition(s) will be due 30 days after Lead Plaintiff files its opposition(s).

IT IS SO ORDERED.

Hon. Aleta A. Trauger
United States District Judge

STIPULATED TO AND
SUBMITTED FOR ENTRY:

/s/ Paul Kent Bramlett

Paul Kent Bramlett (TN #7387)
Robert Preston Bramlett (TN
#25895)
40 Burton Hills Blvd., Suite 200
P.O. Box 150734
Nashville, TN 37215
T: (615) 248-2828
F: (866) 816-4116
pknashlaw@aol.com
robert@bramlettlawoffices.com

Jeremy A. Lieberman
J. Alexander Hood II
Marc C. Gorrie
POMERANTZ LLP
600 Third Ave., 20th Floor
New York, NY 10016
T: (212) 661-1100
F: (212) 661-8665
jalieberman@pomlaw.com
ahood@pomlaw.com
mgorrie@pomlaw.com

Patrick V. Dahlstrom
POMERANTZ LLP
10 South La Salle St., Suite 3505
Chicago, IL 60603
T: (312) 377-1181
F: (312) 377-1184
pdahlstrom@pomlaw.com

Michael Goldberg
Brian Schall
GOLDBERG LAW PC
1999 Avenue of the Stars
Suite 1100
Los Angeles, CA 90067
T: (800) 977-7401
F: (800) 536-0065
michael@goldberglawpc.com
brian@goldberglawpc.com

Attorneys for Plaintiff Nikki Bollinger Grae

/s/ Steven A. Riley

Steven A. Riley (TN #6258)
RILEY WARNOCK &
JACOBSON, PLC
1906 West End. Ave.
Nashville, TN 37203
T: (615) 320-3700
F: (615) 320-3737
sriley@rwjplc.com

David J. Schindler (*pro hac*
application to be filed)
Brian T. Glennon (*pro hac*
application to be filed)
Nathan M. Saper (*pro hac*
application to be filed)
LATHAM & WATKINS LLP
355 South Grand Ave.
Los Angeles, CA 90071
T: (213) 485-1234
F: (213) 891-8763
david.schindler@lw.com
brian.glennon@lw.com
nathan.saper@lw.com

*Attorneys for Defendants
Corrections Corporation of
America, Damon T. Hininger,
David M. Garfinkle, and Todd J.
Mullenger*

CERTIFICATE OF SERVICE

This is to certify that all counsel shown above, who join in this Stipulation, and whether or not appearing on the electronic filing system, have this date been served via e-mail at their regular e-mail addresses.

SO CERTIFIED this 19 September 2016.

s/Paul Kent Bramlett
PAUL KENT BRAMLETT